

1 CLOSE LAW GROUP
2 Jason A. Close (Nevada Bar No. 13674)
3 2831 Saint Rose Pkwy Suite 240
Henderson, NV 89052
4 Phone: (702) 983-4254
Fax: (702) 924-4645
Email: Jason@closelawgroup.com

5 *Attorneys for Defendant*
6 *BUDGET VAN LINES INC.*

7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA

9 MICHAEL CAPLAN, individually and on
behalf of all others similarly situated,

10 Plaintiff,

11 v.

12 BUDGET VAN LINES INC., a New York
company,

13 Defendant.

14 No. 2:20-cv-00130-JCM-VCF

15 **NOTICE OF SETTLEMENT AND
16 STIPULATION TO VACATE OR
17 CONTINUE HEARING**

18 **(First Request)**

19 Plaintiff Michael Caplan (“Plaintiff”) and Defendant Budget Van Lines (individually,
20 “Defendant” and together with Plaintiff, collectively, the “Parties”) hereby stipulate and agree as
21 follows and respectfully request Court approval of same:

22 The parties jointly notify the Court that they have reached a settlement in principle. Plaintiff
23 anticipates filing a dismissal of his individual claim with prejudice and his class claims without
24 prejudice in the next thirty days. In light of the impending settlement and dismissal, the parties
25 respectfully request that the hearings currently scheduled for tomorrow August 26, 2020 be vacated
26 and/or postponed.

27 . . .

28 . . .

29 . . .

So Stipulated and Respectfully Submitted,

Dated: August 25, 2020

By: /s/ Jason A. Close
Jason A. Close (Nevada Bar No. 13674)
CLOSE LAW GROUP
2831 Saint Rose Pkwy Suite 240
Henderson, NV 89052

By: /s/ A. Paul Heeringa
MANATT, PHELPS & PHILLIPS, LLP
CHRISTINE M. REILLY (Admitted PHV)
KRISTIN E. HAULE (Admitted PHV)
A. PAUL HEERINGA (Admitted PHV)

Attorneys for Defendant Budget Van Lines Inc.

By: /s/ Avi R. Kaufman
Avi R. Kaufman (FL Bar No. 84382)
(Admitted *Pro Hac Vice*)
KAUFMAN P.A.
400 NW 26th Street
Miami, Florida 33127

Craig B. Friedberg (Nevada Bar No. 004606)
LAW OFFICES OF CRAIG B. FRIEDBERG,
ESQ.
4760 South Pecos Rd., Ste 103
Las Vegas, Nevada 89121

Attorneys for Plaintiff Michael Caplan

IT IS SO ORDERED,

IT IS HEREBY ORDERED that the hearing scheduled for August 26, 2020, is VACATED. IT IS FURTHER ORDERED that the proposed stipulation and order for dismissal must be filed on or before October 9, 2020.

UNITED STATES MAGISTRATE JUDGE

Dated: 8-25-2020

CERTIFICATE OF SERVICE

I certify that, on August 25, 2020, a true and correct copy of the foregoing document was served on all parties and counsel of record, via the Court's CM/ECF filing system:

/s/ Jason A. Close
Jason A. Close